

JEREMY BAILEY ,

civil action no. 1:20 - cv -1836

PLAINTIFF,

V.

DISTRICT JUDGE: YVETTE KANE

LIEUTENANT YODER,

JOHN DOE, et al.,

DEFENDANTS,

FILED
SCRANTON

MAY 26 2021

Per 
DEPUTY CLERK

PLAINTIFF FIRST OF INTERROGATORIES TO
REQUEST PRODUCTION OF DOCUMENTS

In accordance with rule 33 of the federal rules of civil procedure Plaintiff request Defendant Lieutenant yoder, answer the following interrogatories under oath, and that the answers be sign by the person making them and be serve on Plaintiff within 30 days of service of these interrogatories.

If you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswer portion.

The interrogatories shall be deemed continuing, so as to require supplemental answer s as new and different information materializes.

PLAINTIFF FIRST OF INTERROGATORIES

1. state the names or identify and attach a copy of any and all documents showing who was on duty in unit LEVEL '5' of the R.H.U. at 6:00 am to 2:00 pm shift on september 10, 2019.
2. State the names or identify and attach a copy of any and all written statements , original or copies , identifiable as reported about the incident on september 10, 2019, made by the prison and civilian employees or the department of corrections and prison witnesses.
3. State the names or otherwise identify the officers who moved Z-coded inmate McCullough # GA 6396 from cell 14 to cell 5 with the plaintiff inmate Bailey # LZ 4437 on September 10, 2019 in the LEVEL '5' unit pod '2' or 'B' of the R.H.U.
4. state the names or identify any in all rules, regulations and policies regarding to Z-code inmates and Z-CODE cell movement',

attach all copies as identifiable to the plaintiff request and questions.

5. Identify any and all medical records of plaintiff from time of the incident on september 10 , 2019 in (SCI) coaltownship through and including the date of your response to this request.

6. Identify and attach a copy of any and all documets relating to all defendants staff training and education.

JEREMY BAILEY, # LZ 4437

(SCI) COALTOWNSHIP

1 KELLEY DRIVE

COALTOWNSHIP PA 17866

1:20 cv 1836

Jeremy Bailey

LZ-4437

SCI Coal Township

SPECIAL MAIL - OPEN ONLY IN THE PRESENCE OF THE INMATE

1 Kelley Drive

Coal Township, PA 17866

I am sending a copy of my interrogatories, in which
I have sent 3 copies to the defendant attorney
and expect to have a response in 30 days

**FILED
SCRANTON**

MAY 26 2021

Per SP
DEPUTY CLERK

JEREMY BAILEY #LZ4437
SCI COALTOWNSHIP
1 KALLEY DRIVE
COALTOWNSHIP, PA 17866

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MAY 26 2021

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OFFICE OF THE CLERK
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA
235 NORTH WASHINGTON AVENUE
P.O. BOX 1148
SCRANTON, PA 18501-1148

18501-500448

